


Page 2

4 The Brea Police Department supports the grant of a Pioneer's Preference and rule making to ProNet because:

- (a) We believe, it is a critical enforcement tool for law enforcement that is not currently available by any other company. It allows us to track robbery suspects and attempts to apprehend in a safer location, rather than responding directly into a crime scene and possibly having a barricade situation take place.
- (b) With the institutions in our community that have been the victims of a robberies since the installation of ETS, the apprehension rate is significantly higher than it is with institutions in our community that are not equipped with ProNet ETS.
- (c) I am unaware of another system that is available for jewelry stores or financial institutions to use that allows law enforcement to track a suspect once a robbery has occurred. To my knowledge, ProNet is the only company that provides this type of service.
- (d) If ProNet ETS is not provided a permanent spectrum, and is not granted a Pioneer's Preference, and is subsequently unable to provide this service to institutions within our community, I believe it could create the potential for more hostage situations, lower the apprehension rate of suspects and decrease the recovery rate of stolen property, along with potential for injury of innocent people during a high speed vehicle pursuit.



D. L. FORKUS, CHIEF OF POLICE  
BREA POLICE DEPARTMENT

cc: Reading File  
Subject File  
Sergeant Gary M. Drlik

# CITY OF BUENA PARK



C A L I F O R N I A 9 0 6 2 2

6850 BEACH BOULEVARD, P.O. BOX 5000, PHONE: AREA CODE (714) 521-9900

RICHARD M. TEFANK  
Chief of Police  
February 20, 1990

Ms. Donna R. Searcy, Secretary  
Federal Communications Commission  
1919 M Street N.W., Room 222  
Washington, D.C. 20036

"STAMP AND SIGN"

RECEIVED  
FEB 23 1990  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

REFERENCE: In the matter of a request by ProNet Inc. for grant of a Pioneer's Preference for its Electronic Tracking Service

File #PP-23, RM-7784

Dear Ms. Searcy:

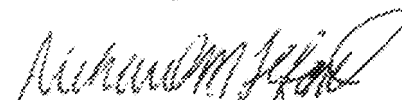
The Buena Park Police Department hereby submits its comments in support of the above referenced Request for a Pioneer's Preference filed by ProNet Inc.

1. The Buena Park Police Department is located in Orange County. As the law enforcement agency for the City of Buena Park, we are interested in providing our citizens and businesses the highest quality law enforcement service.
2. Since August 23, 1989, ProNet has provided all law enforcement agencies in Orange County with the Electronic Tracking System (ETS) to assist in the location and apprehension of armed robbery suspects. This system has been highly successful and resulted in arrest of two armed robbery suspects in our community alone.
3. I am familiar with ProNet's request and its Petition for Rulemaking to provide permanent spectrum in the 216-220 MHz band for the Electronic Tracking System (ETS) and to authorize the Electronic Tracking System (ETS) to operate under the Business Radio Service rules and that I fully support that request.
4. The Buena Park Police Department supports the grant of a Pioneer's Preference (and Rulemaking) to ProNet because:
  - a. This is a critical tool for law enforcement since it assists in the apprehension of dangerous armed robbery suspects and recovery of victims' property.

Ms. Donna R. Searcy, Secretary  
Federal Communications Commission  
February 20, 1992 Page #2

- b. Without the Electronic Tracking System two armed robbery suspects would not have been apprehended in Buena Park and convicted. This system has been highly accepted and valued by our personnel.
- c. This technology is unique and effective because it allows law enforcement to track and locate a suspect without the suspect's knowledge and is safe for the general public. Within Orange County it allows all law enforcement agencies to work together to track and locate the suspect in a coordinated effort.
- d. The Buena Park Police Department will lose a significant law enforcement tool if the Electronic Tracking System is not provided permanent spectrum and is not granted a Pioneer's Preference.

Sincerely,

  
RICHARD M. TEJANK  
Chief of Police

RMT/dr



POLICE DEPARTMENT

Post Office Box 144 Addison, Texas 75001

(214) 450-7100

February 26, 1992

Ms. Donna R. Searcy  
Secretary  
Federal Communications Commission  
1919 M Street N.W., Room 222  
Washington, D.C. 20036

REFERENCE: In the matter of a request by ProNet, Inc.  
for a grant of its Electronic Tracking Service

File #PP-23, RM-7784

Dear Ms. Searcy:

The Addison Police Department, Addison, Texas, hereby submits its comments in support of the above reference request for a Pioneer's Preference filed by ProNet, Inc.

As a municipal law enforcement agency, we are constantly searching for new, innovative and effective methods which will enable us to better apprehend and deter the lawless members of our society. In January, 1987, the Addison Police Department became convinced that the electronic tracking system, which is provided by ProNet, Inc., would help us in a significant way to accomplish this goal.

Since our relationship with their electronic tracking system, ProNet, Inc. has provided the equipment and technical support required to make such a complex system function in the proper manner. In so doing, it has enabled our department to apprehend the offenders in numerous offenses and has allowed us to recover a significant amount of property, from radar detectors to automobiles. We have not lost a prosecution yet.

FEDERAL COMMUNICATIONS  
COMMISSION  
OFFICE OF THE  
SECRETARY

MAR 2 1992

RECEIVED

The Electronic Tracking Service offered by ProNet, Inc. has become an invaluable law enforcement tool for not only the Town of Addison, but for the entire Dallas area. We have yet to locate a better tracking system for the environment in which it is being utilized.

We are aware of ProNet's request and its Petition for Rulemaking to provide permanent spectrum in the 216-220 MHz band for their Electronic Tracking System to operate under the Business Radio Service rules, and we fully support this request.

Should ProNet, Inc. not be granted a Pioneer's Preference, it would have a tremendous adverse effect on our efforts to apprehend and prosecute many of those who prey on our society.

Sincerely,

JAMES McLAUGHLIN, JR.  
CHIEF OF POLICE

*Gary L. Taylor*

Gary L. Taylor  
Electronic Tracking System Coordinator  
Addison Police Department

GLT:rs

*Mayor*

JOHN O. TYNES

*City Administrator*

ROBERT D'AMATO

*Councilmembers*

CAROL DOWNEY

NORMAN Z. ECKENRODE

MARIA MORENO

ARTHUR G. NEWTON

*The People are the City*



*Police Chief*

MANUEL ORTEGA

*Administrative Captain*

JAMES ROBERTSON

*Patrol Captain*

DARYLL THOMANN

**Police Department**

(714) 993-8164

401 East Chapman Avenue - Placentia, California 92670

March 9, 1992

Ms. Donna R. Searcy  
Secretary  
Federal Communications Commission  
1919 M Street N.W., Room 222  
Washington, DC 20036

Reference: In the matter of the request by Pro Net Inc.  
for grant of a Pioneer's Preference for its  
Electronic Tracking Service

File #PP-23, RM-7784

Dear Ms. Searcy,


On behalf of the Placentia Police Department I am submitting my comments in support of the above referenced request for a Pioneer's Preference filed by Pro Net Inc. We have been involved with Pro Net Inc. for the past two and a half years. In that time we have seen the proven effects of Pro Net's product and service. Over 90% of the bank robberies that have occurred in our city where Pro Net was installed have resulted in the capture of the suspect(s) and return of the money to the financial institution. Only one time have we had a bank robber defeat the Pro Net system, and that was by bending over a pack of money that had a Pro Net transmitter hidden in it and breaking the antenna. Even then the bank robber had no idea that he had taken a transmitter pack.

I am familiar with Pro Net's request and its Petition for Rulemaking to provide permanent spectrum in the 216-22 MHz band for ETS, and to authorize ETS to operate under the Business Radio Service rules and we fully support this request.

In the past two and half years Pro Net has proved to us that they have a very effective tool that has greatly assisted law

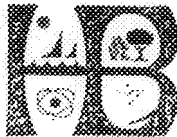
enforcement not only in our city but in our County. In this day and age when some companies are manufacturing products to help defeat law enforcements efforts, Pro Net has offered us a product and a service to help make our job a little easier.

We would respectfully request the FCC to grant to Pro Net a Pioneer's Preference for its Electronic Tracking Service.



Manuel E. Ortega  
Chief of Police

MEO/mr



# CITY OF HUNTINGTON BEACH

2000 MAIN STREET  
P.O. BOX 70

POLICE DEPARTMENT

CALIFORNIA 92648  
Tel: (714) 960-8811

RONALD E. LOWENBERG  
Chief of Police

February 20, 1992

Ms. Donna R. Searcy  
Secretary  
Federal Communications Commission  
1919 M Street N.W., Room 222  
Washington, D.C. 20036

Reference: In the matter of a request by ProNet Inc. for  
grant for a Pioneer's Preference for its  
Electronic Tracking Service

File # PP-23, RM-7784

Dear Ms. Searcy:

The Huntington Beach Police Department hereby submits its  
comments in support of the above referenced request for a  
Pioneers Preference filed by ProNet Inc.

1. The Huntington Beach Police Department provides law enforcement services for a southern California city of 182,000 persons and a summer time population that can sometimes be triple that figure. The police department utilizes the Electronic Tracking System and is interested in maintaining and retaining this crime fighting tool.
2. The Huntington Beach Police Department has been utilizing the Electronic Tracking System since 1989. During this time, use of the system has resulted in the tracking and capture of several robbery suspects who were fleeing from crimes they had just committed. These timely captures also allowed for the recovery of the property that had been stolen.
3. The Huntington Beach Police Department is familiar with ProNet's request and its petition for rulemaking to provide permanent spectrum in the 216-220 MHz band for




ETS, and to authorize ETS to operate under the Business Radio Service rules. We fully support this request.

The Huntington Beach Police Department supports the grant of a pioneer's preference to ProNet because it offers a unique crime fighting tool that is unavailable through any other media. In the situations cited above, these arrests would have been impossible without a system such as ETS because of incomplete descriptions of vehicles and suspects as well as a specific direction of travel. The ETS system allows police officers to capture a signal and track it to a point of arrest. Because suspects are captured shortly after the crime is committed and with the stolen property in their possession, subsequent prosecution is enhanced and almost a certainty.

Although firm supportive data is unavailable, we have reason to believe the system has become a deterrent to some crimes, particularly institutional robbery, and we have found that perpetrators are now looking for signs of a signaling device when they commit such crimes. If the failure to grant ETS a permanent spectrum results in some change or loss of that service, our agency, the community and law enforcement in general will have lost a unique and effective crime fighting tool.

Sincerely,

  
Ronald E. Lowenberg  
Chief of Police

RL/ms



CITY OF ANAHEIM, CALIFORNIA

Police Department

February 27, 1992

Ms. Donna R. Searcy, Secretary  
FEDERAL COMMUNICATIONS COMMISSION  
1919 M Street N.W., Room 222  
Washington, D.C. 20036

RE: In the matter of a request by ProNet Inc. for grant of a  
Pioneer's Preference for its Electronic Tracking Service

File #PP-23, RM-7784

Dear Ms. Searcy:

The Anaheim Police Department hereby submits its Comments in Support of the above referenced Request for a Pioneer's Preference filed by ProNet Inc.

As the Chief of the Anaheim Police Department, I wish to express my support in ProNet Inc.'s bid for a Pioneer's Preference grant for its Electronic Tracking System.

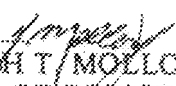
The Anaheim Police Department entered into a contract with ProNet in May of 1989. ProNet's Electronic Tracking System has proven to be of great assistance to us in locating and arresting fleeing bank robbers.

I am familiar with ProNet's Request and their Petition for Rulemaking to provide permanent spectrum in the 216-220 MHz band for ETS, and to authorize ETS to operate under the Business Radio Service rules and we fully support this request.

The Anaheim Police Department supports the grant of a Pioneer's Preference (and Rulemaking) to ProNet because they have a proven track record in providing innovative technology which assists us in the fight against serious crime.

Based on the Tracking System's record, it is clear that a grant of a Pioneer's Preference for permanent licensed operation of this sophisticated tracking technology will facilitate crime prevention significantly and thus will serve the public interest.

Sincerely,

  
JOSEPH T. MOLLOY  
CHIEF OF POLICE

JTM:jn



JOHN MORAN, SHERIFF

February 19, 1992

Ms. Donna R. Searcy  
Secretary  
Federal Communications Commission  
1919 M Street N.W., Room 222  
Washington, DC 20036

REFERENCE: In the matter of a request by ProNet Inc. for grant of a Pioneer's Preference for its Electronic Tracking Service.

File #PP-23, RM-7784

Dear Ms. Searcy:

Las Vegas Metropolitan Police Department hereby submits its comments in support of the above reference Request for a Pioneer's Preference filed by ProNet Inc.

I have been assigned to the Robbery Detail of the Detective Bureau for over three and one half years. This department has utilized the ProNet tracking system since 1984. This Department and its community would support the request by ProNet for a grant for a Pioneer's Preference since this system has greatly contributed to the arrest of many bank robbers in this area.

ProNet has demonstrated continued professionalism in providing what I believe to be the most productive security system available to the banking industry. Each year our apprehension rate approaches or exceeds the 90% mark and this is due largely to the ProNet system. Additionally, with these apprehensions, monetary recovery is in the tens of thousands of dollars.

This Department is familiar with ProNet's request and its Petition for Rulemaking to provide permanent spectrum in the 216-220 MHz band for ETS and to authorize ETS to operate under the Business Radio Service rules and that we fully support this request.



February 19, 1992  
Page Two


The Las Vegas Metropolitan Police Department supports the grant of a Pioneer's Preference (and Rulemaking) to ProNet because it is a critical Law Enforcement tool to the capture of active robbery suspects in the community. It is estimated that the average robbery suspect commits at least five to seven robberies; therefore, each suspect that is taken into custody is a significant factor in the reduction of future robberies. Additionally, this system affords us the opportunity to capture suspects relatively soon after the commission of the crime where physical evidence and recovered cash is found on the suspect. This often leads to confessions and significantly higher conviction rates which further assist in keeping these suspects off the streets.

In my opinion this is the only technology ever to have this much impact on the capture of robbery suspects. This is the major reason our apprehension rate is the or among the highest in the nation.

If ETS (ProNet) is not provided permanent spectrum and is not granted a Pioneer's Preference, it is felt that the existence of this system would be in a great jeopardy if for some reason they were not permitted to use this frequency. The results of not having this system in this area, to say the least, would be detrimental to the efforts of Law Enforcement and this community.

Respectfully,

John Moran, Sheriff

  
BY: Greg Jolley, Lieutenant  
Crimes Against Person Section

GJ/sb  
92R0047



## City of Phoenix

POLICE DEPARTMENT

February 26, 1992

Ms. Donna R. Searcy  
Secretary  
Federal Communications Commission  
1919 M Street N.W., Room 222  
Washington, D.C. 20036

REFERENCE: The matter of a request by Pro-Net, Inc. for grant of a Pioneer's Preference for its Electronic Tracking Service  
File #PP-23, RM-7784

Dear Ms. Searcy:

The City of Phoenix Police Department hereby submits its comments in support of the above-referenced Request for a Pioneer's Preference filed by Pro-Net, Inc.

The City of Phoenix, Arizona Police Department is a major municipal police department which is experiencing an increase in major crimes, including armed robberies of financial institutions. In an effort to curb the increase in robberies and improve the likelihood of apprehensions of the perpetrators, Pro-Net, Inc. was contacted to provide electronic tracking equipment designed for this purpose.

Since the initial installation of the Pro-Net tracking service in a limited area of the Phoenix City limits in February, 1991, twelve bank robbery arrests have been directly attributed to the tracking system, and over \$32,000 has been recovered.

We are familiar with Pro-Net's request and its Petition for Rulemaking to provide permanent spectrum in the 216-220MHz band for ETS. We fully support this request and their request to operate under the Business Radio Service Rules.

The Electronic Tracking service has proven to be a beneficial, if not critical, law enforcement tool in our community. Bank robbery suspects that have previously been successful in evading detection are now susceptible to apprehension much sooner and with less hazard to citizens and law enforcement officers than ever before.

We fully support ETS' request for permanent spectrum and a Pioneer's Preference.

Sincerely,

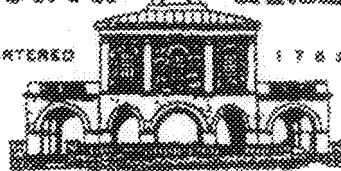
DENNIS A. GARRETT  
Police Chief

*E. H. Rodabough*  
E. H. RODABOUGH, Captain  
General Investigations Bureau

dt

THE CITY OF FAYETTEVILLE  
NORTH CAROLINA

CHARTERED 1782



OFFICE OF THE CHIEF OF POLICE  
SUITE 124, 131 DICK STREET

28 February 1992

FAYETTEVILLE, N. C. 28301-5798  
TELEPHONE: (919) 433-1819

MEMORANDUM FOR THE SECRETARY

RE: In the matter of a request by ProNet, Inc. for grant  
of a Pioneer's Preference for its Electronic  
Tracking System--File #PP-23, RM-7784

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE  
SECRETARY

MAR 2 '92

RECEIVED

Ms. Donna R. Searcy  
Secretary  
Federal Communication Commission  
1919 M. Street N.W., Room 222  
Washington, D.C. 20036

RE: In the matter of a request by ProNet, Inc. for grant  
of a Pioneer's Preference for its Electronic  
Tracking System--File #PP-23, RM-7784

Dear Ms. Searcy:

The Fayetteville Police Department hereby submits its  
comments in support of the above referenced request for a  
Pioneer's Preference filed by ProNet, Inc.

Our City is interested in obtaining the services provided  
by ProNet, Inc. Obviously we need the support of the Federal  
Communications Commission for ProNet to be able to provide the  
needed services which are critical to law enforcement.

Thank you for your support in this matter.

Sincerely,

  
RONALD E. HANSEN  
Chief of Police

REH:lof

122nd NATIONALLY ACCREDITED



LAW ENFORCEMENT AGENCY

An Equal Opportunity Affirmative Action Employer

MAYOR  
Dan Young  
MAYOR PRO TEM  
Miguel A. Pulido  
COUNCILMEMBERS  
John Acosta  
Daniel E. Criser  
Patricia A. McGuigan  
Rick Norton  
Robert L. Richardson



## CITY OF SANTA ANA

POLICE DEPARTMENT  
24 CIVIC CENTER PLAZA • P.O. BOX 1981  
SANTA ANA, CALIFORNIA 92702

ALL-AMERICA CITY 1982-83

CITY MANAGER  
David N. Ream  
CITY ATTORNEY  
Edward J. Cooper  
CLERK OF THE COUNCIL  
Janice C. Guy

February 20, 1992

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MAR 2 1992  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE  
SECRETARY

Ms. Donna R. Searcy, Secretary  
Federal Communications Commission  
1919 M Street N.W., Room 222  
Washington, D.C. 20036

REFERENCE: In the matter of a request by ProNet Inc. for grant of a  
Pioneer's Preference for its Electronic Tracking Service

File #PP-23, RM-7784

Dear Ms. Searcy:

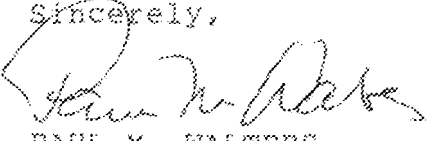
The Santa Ana Police Department hereby submits its comments in support  
of the above referenced Request for a Pioneer's Preference filed by  
ProNet Inc.

The Santa Ana Police Department has been utilizing the ProNet  
Electronic Tracking System technology for the past three years.  
During this time, several significant apprehensions have been  
accomplished which were directly related to the ETS system.

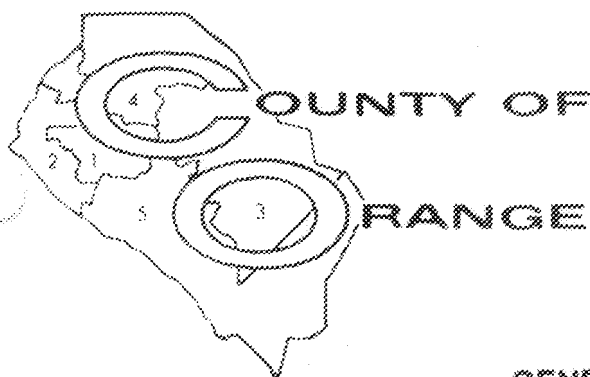
We have been made aware of ProNet's request and its petition for  
rule-making to provide permanent spectrum in the 216-220 MHz band for  
ETS, and authorization to operate under the Business Radio Service  
rules. We at the Santa Ana Police Department fully support ProNet's  
effort to secure approval of said request.

The Santa Ana Police Department supports ProNet's efforts to secure  
Pioneer's Preference in order to continue with its innovative ETS  
technology. The ETS system has proved to be a critical tool within  
the law enforcement community and the loss of such an asset would  
certainly be a disservice to the law enforcement community and the  
public we serve.

Sincerely,

  
PAUL M. WALTERS  
Chief of Police

/it



February 24, 1992

**GENERAL SERVICES AGENCY  
COMMUNICATIONS DIVISION**

Ms. Donna R. Searcy, Secretary  
Federal Communications Commission  
1919 M Street N.W., Room 222  
Washington, D.C. 20036

REFERENCE: In the matter of a request by ProNet Inc. for grant  
of a Pioneer's Preference for its Electronic  
Tracking Service - File #PP-23, RM-7784

Dear Ms. Searcy:

The County of Orange, GSA/Communications Division hereby submits  
its Comments in support of the above referenced Request for a  
Pioneer's Preference filed by ProNet Inc.

1. The County of Orange, GSA/Communications Division provides  
Communications coordination and services to all public  
safety agencies in Orange County, California.
2. We are the coordinating agency when a ProNet Tracking System  
activation occurs. In 1991, this county experienced twelve  
successful activations where suspects were taken into  
custody as a direct result of the ProNet Tracking System.
3. We are familiar with ProNet's Request and its Petition for  
Rulemaking to provide permanent spectrum in the 216-220 MHz  
band for ETS, and to authorize ETS to operate under the  
Business Radio Service rules. The County of Orange,  
GSA/Communications Division fully supports this request.
4. We support the grant of a Pioneer's Preference (and  
Rulemaking) to ProNet because the Orange County Chiefs of  
Police and Sheriffs Association feels this is a critical law  
enforcement tool, and supports this system. The Electronic  
Tracking System, using innovative technology, has proven to  
be successful in apprehending crime suspects and the return  
of money and merchandise to the owner.

Sincerely,

Robert C. Jones, Manager  
GSA/Communications Division

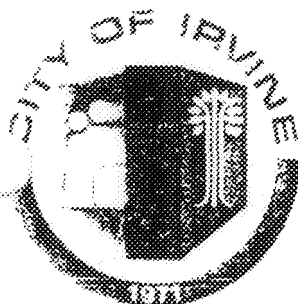
R. A. SCOTT  
Director, General Services Agency  
ROBERT G. LOVE  
Deputy Director, General Services Agency  
JACQUELINE K. HENDERSON  
Director of Information Systems  
ROBERT C. JONES  
Manager, GSA/Communications Division

ADMINISTRATION, ENGINEERING & MAINTENANCE  
1985 South Santa Cruz Street  
Anaheim, CA 92805-6815  
(714) 938-4300 FAX (714) 938-4396

COUNTY COORDINATED COMMUNICATIONS CENTER  
481 The City Drive South  
Orange, CA 92668-2903  
(714) 834-7187 FAX (714) 937-0371

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MAR 2 '92  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE  
SECRETARY





February 20, 1992

Ms. Donna R. Searcy, Secretary  
Federal Communications Commission  
1919 M Street N.W., Room 222  
Washington, D.C. 20036

Re: In the matter of a request by ProNet, Inc. for a grant of a  
Pioneer's Preference for its Electronic Tracking Service  
File# PP-23, RM-7784

Dear Ms. Searcy:

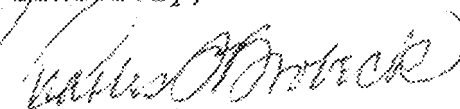
As Chief of Police of the Irvine, California Police Department, I submit the following comments for your review as you consider ProNet, Inc.'s request for a Pioneer's Preference.

The Irvine Police Department is one of 26 law enforcement agencies located in Orange County, California. This is a large metropolitan area with a service population in excess of 2.5 million. There has been a long-standing tradition of cooperation among these agencies in addressing crime problems.

As a member of the Orange County Chiefs' and Sheriff's Association, I feel that the technology of the Electronic Tracking System is extremely useful to our goal of reducing robberies and associated crimes of violence. This is one of the most sophisticated crime reduction technologies available to law enforcement in this area.

I am familiar with ProNet's request and its Petition for Rulemaking to provide permanent spectrum in the 216-220 MHz band for ETS to operate under the Business Radio Service rules and I fully support this request. The ETS has become an integral tool for law enforcement agencies in Orange County and we rely upon this technology, particularly as it relates to the apprehension of armed robbers. Loss of this valuable service would, in my judgment, be detrimental to our goal of reducing the incidents of violent crime in our communities.

Sincerely,

  
CHARLES S. BROBECK  
Chief of Police

CSB:JB:ct

RECEIVED  
FEB 22 1992  
FEDERAL COMMUNICATIONS  
COMMISSION  
OFFICE OF THE  
SECRETARY



DEPARTMENT OF  
POLICE

CITY OF SACRAMENTO  
CALIFORNIA

HALL OF JUSTICE  
813 SIXTH STREET  
SACRAMENTO, CA  
95814-2495

916-449-5121

JOHN F. KEARNS  
CHIEF OF POLICE

February 21, 1992

Ref: 0292-8

Donna R. Searcy  
Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20036

Re: In matter of a request by ProNet Inc. for grant of a Pioneer's Preference for  
its Electronic Tracking Service

File # PP-23, RM-7784

Dear Ms. Searcy:

The Sacramento Police Department is responsible for law enforcement in City of Sacramento encompasses approximately 92 square miles with a population over 360,000. The City's population inflates to over 500,000 during business hours. The department has 620 sworn and 305 non sworn career employees. Like all large metropolitan areas, Sacramento experiences a high crime rate in major felonies including robbery. In 1991, there were 674 commercial robberies and 52 bank robberies in the City.

Since 1986, the Sacramento Police Department, in conjunction with local financial institutions, other businesses and ProNet, deploys Electronic Tracking System (ETS) devices to apprehend robbers. The devices are harder to detect by criminals in comparison with other devices such as dye packs. They aid law enforcement in quick, safe apprehensions of robbers. In 1991, sixteen robberies in the City involved the devices. Four robberies, 25%, resulted in an immediate arrest and the total recovery of stolen property.

February 21, 1992

The department has been pleased with the ETS devices. In addition to the devices controlled by ProNet, we have contracted with ProNet and now lease eleven. The department places the devices in businesses that are unable to afford the devices and those which are not normally primary robbery targets.

We are familiar with ProNet's Request and its Petition for Rulemaking to provide permanent spectrum in the 216-220 Mhz band for ETS, and to authorize ETS to operate under the Business Radio Service rules. We fully support this request.

The Sacramento Police Department continually looks at technological advances in equipment to assist us. Our goal is to use the most effective equipment available to apprehend criminals while minimizing the risk of injury to officers and citizens.

The average crime rate for robberies in the City between 1981 and 1991 shows a decline since establishing the program. The average crime rate for robberies between 1987 and 1991 was 512.5 crimes per 100,000 population. The average crime rate between 1981 and 1986 was 590.7. This reflects a 13.2% drop in robbery crime rates. While not all the credit can go to the ETS devices, it has had a positive impact. Commercial robberies tend to be performed in series. Removing such criminals from the streets through using ETS devices favorably impact crime rates.

We have found that ProNet has provided law enforcement the most current and innovative technology to combat commercial robberies. The ETS devices have proven to be an invaluable tool for the Sacramento Police Department and the business community.

Chief John P. Kearns is aware of the ProNet Inc. petition to the FCC asking for an amendment to Part 90 of the Commission's Rules to establish ETS as a permanent service under the Business Radio Service. Law enforcement needs sophisticated security equipment such as the ETS devices if it hopes to maintain the upper hand on the criminal element.

I strongly support that you grant ProNet Inc. the permanent status. This will allow us to provide the best protection available to our community.

Sincerely,



LEE C. DOHM, DEPUTY CHIEF  
OFFICE OF ADMINISTRATIVE SERVICES

LCD:rec



City of University Park

February 21, 1992

Ms. Donna R. Searcy  
Secretary  
Federal Communications Commission  
1919 M Street N.W., Room 222  
Washington, D.C. 20036

Reference: In the matter of a request by ProNet Inc. for  
grant of a Pioneer's Preference for its Electronic Tracking  
Service

File # PP-23,RM-7784

Dear Ms. Searcy:

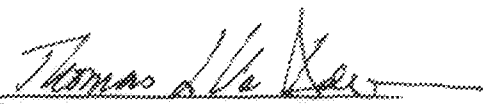
The University Park Police Department hereby submits its  
Comments in support of the above referenced Request for a  
Pioneer's Preference filed by ProNet Inc.

1. The University Park Police Department is a municipal law enforcement unit providing protective services to a community of 23,000 residents in Dallas County, Texas.
2. The University Park Police Department has had a working relationship with ProNet's Electronic Tracking System since August, 1987. During the past 5 years the University Park Police Department has utilized this service in the apprehension and conviction of serious felonies. In felonies in which Electronic Tracking System equipment was utilized we have experienced over a 90% apprehension rate and a 100% conviction rate. The Department believes this service to be an essential and valuable tool to local public safety.
3. We are familiar with ProNet's Request and its Petition for Rulemaking to provide permanent spectrum in the 216-220 MHz band for ETS, and to authorize ETS to operate under the Business Radio Service rules and we fully support this request.

Petition for Pioneer Preference  
ProNet, Inc.  
File # PP-23, RM-7784  
Page 2

4. The University Park Police Department supports the grant of a Pioneer's Preference (and Rulemaking) to ProNet because:
- a. The Electronic Tracking System is critical to local law enforcement in the area of apprehension of serious criminals.
  - b. The Electronic Tracking System by its success rate offers a significant deterrence to serious crime.
  - c. The Electronic Tracking System is the only system of its kind to be offered in this area and has been an innovator of technology in the law enforcement area.
  - d. If ProNet, Inc. is not provided a permanent spectrum and is not provided a Pioneer's Preference for its ETS system, the University Park Police Department feels that a valuable tool against serious crime will be lost in this community.

Sincerely,

  
Thomas L. Van Doren  
Assistant Chief of Police  
University Park Police Department



U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to  
File No. 91-PD-31967

Post Office Box 709  
Portland, Oregon 97207  
February 27, 1992

Federal Communications Commission  
Room 222  
1919 M Street, N.W.  
Washington, D.C. 20036

Attention: Donna Searcy  
Office of the Secretary

RECEIVED  
FEB 27 1992  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY  
STAMP

Re: In the Matter of Par 90 of the  
Commission's Rules to Provide for the  
Use of the 220-222 MHz Band by the  
Private Land Mobile Radio Services.

PR DK. NO. 89-552

Dear Sirs,

The Federal Bureau of Investigation (FBI), Portland, Oregon, has been contacted by Electronic Systems Incorporated, (ETSI), based in Dallas, Texas, requesting FBI support for ETSI's application for additional frequency spectrum.

This communication is not in support of ETSI or any other individual company, per se, but instead for whatever improvements or expansions might be made in electronic currency tracking systems currently marketed by ETSI under the name ProNet Tracking Systems.

The Portland Office of the FBI is cognizant that this electronic tracking system has been utilized in cities across the United States, and has resulted in a dramatic increase in the number of apprehensions of bank robbers wherein currency with the tracking device were taken in the robberies.

The State of Oregon continues to rank among the leaders nationally in the incidence of bank robbery, the majority of which have occurred in the Portland Metropolitan area. The Portland FBI, working closely with the Portland Police Bureau (PPB), played a major role in the establishment of an electronic tracking system, and since its inception in 1990 has been directly responsible for the apprehension of several individuals responsible for Portland area bank robberies.

FEDERAL COMMUNICATIONS COMMISSION

The Portland FBI supports ETSI's application for frequency band expansion insofar as such expansion would facilitate expanded use of the currency tracking system in robbery and/or extortion applications.

Sincerely,



ROBIN L. MONTGOMERY  
Special Agent in Charge

cc: Electronic Tracking Systems Inc.  
600 Data Drive, Suite 100  
Plano, Texas 75075

RECEIVED

Mar 2 '92

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE  
SECRETARY

U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to  
File No.John Lawrence Bailey FBI Building  
700 East Charleston Boulevard  
Las Vegas, Nevada 89104  
February 27, 1992Ms. Donna R. Searcy  
Secretary  
Federal Communications Commission  
1919 M Street N.W., Room 222  
Washington, D.C. 20036

"STAMP AND RETURN"

Dear Ms. Searcy:

The Federal Bureau of Investigation in Las Vegas, Nevada, has had contact with the ProNet System for several years. During the years, the Las Vegas Division has dealt with the ProNet System in regards to bank robbery. The arrest rate of subjects committing robberies has increased with the use of the ProNet System and the repeat of robberies by the same individual has been reduced greatly.

The Electronic Tracking Service is an excellent system in assisting law enforcement agencies and is unique. The advancement of the technology regarding the Electronic Tracking Service will enhance the system as already witnessed in the new design.

Sincerely yours,

EDWARD J. JENKINS  
Acting Special Agent in ChargeBy:  
RICHARD E. WHITAKER  
Supervisory Special Agent





U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to  
File No.

2635 Century Pkwy NE, Suite. 400  
Atlanta, Georgia 30345  
February 24, 1992

Ms. Donna R. Searcy  
Secretary  
Federal Communications Commission  
1919 M. Street, N.W., Room 222  
Washington, D.C. 20036

Reference: In the matter of a request by ProNet Inc. for grant  
of a Pioneer's Preference for its Electronic  
Tracking Service

File # PP-23, RM-7784

Dear Ms. Searcy:

The Federal Bureau of Investigation (FBI), Atlanta,  
Violent Crimes Major Offender Squad, hereby submits its Comments  
in support of the above referenced Request for a Pioneer's  
Preference filed by ProNet Incorporated.

The Violent Crimes Major Offender Squad in the Atlanta  
Office of the FBI represents the squad which deals primarily with  
violations of the Federal Bank Robbery Statute. I am the  
supervisor of this squad and began a relationship with ProNet,  
Incorporated, in early 1991 when Mike E. Markwood of ProNet,  
Incorporated, gave a demonstration presentation of the ProNet  
Tracking System and its effects on the bank robbery problem.  
Subsequent to this demonstration, I contacted my contemporaries,  
that is, other FBI supervisors in charge of bank robbery squads  
in several other cities, and was informed by them that the  
installation of the ProNet Tracking System resulted in a drastic  
reduction of bank robbery violations in the territories in which  
the system was installed. In many cases bank robberies were cut  
in half which is an astounding accomplishment. Efforts are  
currently on the way with my full support for ProNet to sell to  
the banking community in the Atlanta, Georgia, area. With this  
tracking system, it will enable the quick apprehension of  
violators of the Bank Robbery Statute.